IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHAPTER 13 Kimberly Ann Glaser aka Kimberly A. Glaser aka Kimberly Glaser aka Kimberly A. Lamanna aka Kimberly Ann Montello Debtor Wells Fargo Bank, N. A. as Trustee for the Carrington NO. 19-11998 MDC Mortgage Loan Trust, Series 2007-FRE1, Asset-Backed Pass-Through Certificates Movant VS. 11 U.S.C. Section 362 Kimberly Ann Glaser aka Kimberly A. Glaser aka Kimberly Glaser aka Kimberly A. Lamanna aka Kimberly Ann Montello **Debtor** William C. Miller Esq.

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. Debtor is current on post-petition loan payments through September 2019.

Trustee

- 2. Debtor(s) shall maintain post-petition contractual monthly loan payments due to Movant going forward, beginning with the payment due October 1, 2019 in the amount of \$507.56.
- 3. In the event Movant believes that the payments under Section 2 above are not being made, the Movant may relist via Praecipe the instant Motion for Relief hearing without the need to file a new motion.
- 4. Notwithstanding paragraphs two (2) and three (3) above, nothing in this Stipulation prevents

 Debtor from raising any and all defenses to the motion for relief that would have been available to Debtor had
 this stipulation not been entered into.

5.

be null and void, and is not binding upon the parties.

If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall

Date: 11/1/2019	By:/s/ Rebecca A. Solarz, Esquire Rebecca A. Solarz, Esquire
Date: 10/10/20/9	Irwin Trauss. Esquire Attorney for Debtor
Date: 14/1/19	William C. Miller. Esquire Attorney for Debtor
Approved by the Court this 14th day of Noo discretion regarding entry of any further order.	vember, 2019. However, the court retains
	Magdelin D. Colem
Chief U.S.	Bankruptcy Judge

Magdeline D. Coleman